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Attorneys for Motors Liquidation Company Avoidance Action Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:	09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	(Jointly Administered)
Debtors.	:	
-----X	:	

**CERTIFICATE OF NO OBJECTION TO THE MOTION OF THE MOTORS
LIQUIDATION COMPANY AVOIDANCE ACTION TRUST, BY AND THROUGH
WILMINGTON TRUST COMPANY ACTING SOLELY IN ITS CAPACITY AS
AVOIDANCE ACTION TRUST ADMINISTRATOR, FOR ORDER APPROVING
APPOINTMENT OF SUCCESSOR AVOIDANCE ACTION TRUST MONITOR**

On May 27, 2015, the Motors Liquidation Company Avoidance Action Trust (“**AA Trust**”), as established under the Second Amended Joint Chapter 11 Plan dated as of March 18, 2011 [Docket No. 9836] of the above-captioned debtors, by and through Wilmington Trust Company, solely in its capacity as the administrator and trustee of the AA Trust, filed the Motion for an Order Approving Appointment of a Successor Avoidance Action Trust Monitor [Docket No. 13164] (the “**Motion**”).

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, the undersigned certifies that, as of the date hereof, which is more than forty-eight (48) hours after the objection deadline, Dickstein Shapiro LLP (“**Dickstein**”) has received no objection or otherwise responsive pleading to the Motion.

The undersigned further certifies that, on May 27, 2015, Dickstein caused the Motion and Notice of Hearing on the Motion [Docket No. 13165] (the “**Notice of Hearing**”) to be served on the master service list and notice appearance parties, the twenty (20) largest creditors of the Remediation and Liability Management Company, Inc. and of the Environmental Corporate Remediation Company, Inc., and the United States Trustee. See May 28, 2015 Affidavit of Service of Garden City Group, LLC [Docket No. 13168].

Pursuant to the Notice of Hearing, responses to the Motion were to be filed with the Court and served on the AA Trust no later than June 16, 2015 at 4:00 p.m. (prevailing Eastern time) (the “**Responsive Deadline**”). The notice specifically stated that if no responses were received by the Responsive Deadline, then the relief requested in the Motion could be granted without further notice or hearing.

The undersigned further certifies that, as of the date hereof, based upon review of the Court’s docket in this case, no objection or other responsive pleading to the Motion has been filed.

WHEREFORE, the AA Trust respectfully requests that, at the earliest convenience of the Court, an order be entered granting the Motion and approving the appointment of Arthur J. Gonzalez, Esq., as trust monitor of the AA Trust.

Dated: New York, New York
June 18, 2015

Respectfully submitted,

DICKSTEIN SHAPIRO LLP

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